

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

JOSE L. RODRIGUEZ RUIZ
IN RE JO ANNE VAZQUEZ
RODRIGUEZ

CASE No.: 15-07632 (EAG)

Chapter 7

DEBTOR

JOSE L RODRIGUEZ RUIZ
JO ANNE VAZQUEZ RODRIGUEZ

ADV. NO. 16-00205

PLAINTIFF

Vs.

Contempt and damages for the Violation of
the Automatic Stay and Discharge Injunction:
Leave of Court to Initiate Preference Transfer
Action not initiated by Trustee

RETIREMENT SYSTEM
ADMINISTRATION (RSA)
GOVERNMENT EMPLOYEES
ASSOCIATION (AEELA)
PUERTO RICO POLICE
DEPARTMENT (PPD)

DEFENDANT

JOINT INITIAL SCHEDULING CONFERENCE REPORT

TO THE HONORABLE EDWARD A. GODOY
UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, through counsel, José Rodríguez Ruiz and Jo Anne Vázquez Rodríguez, (“Debtor/Plaintiffs”), the Retirement System Administration (hereinafter “RSA”), Police Department through the Department of Justice, (collectively, “the Parties”), who respectfully state and pray as follows:

Pursuant to Federal Rule of Civil Procedure 26(f) – made applicable to bankruptcy Proceedings by Federal Rules of Bankruptcy Procedure 7026 and 9014 – the parties hereby submit their Discovery Plan in accordance with P.R. LBR 7016-1 and 7026-1(a):

1. The parties agree that all disclosures under the Federal Rules of Bankruptcy Procedure 7026(a)(1) will be made on or before Monday, May 24, 2017.

2. The parties will conduct discovery concerning their respective claims and defenses. See Federal Rule of Bankruptcy Procedure 7026(f)(2).

3. The parties anticipate that discovery will be completed within 120 days and agree to a discovery closure date of Wednesday, July 26, 2017.

4. The parties do not believe they need a deadline to join other parties or amend the pleadings as such actions are not contemplated at this time. If applicable, the deadline for joinder of parties or to amend pleadings is on or before Monday, June 26, 2017.

5. The parties agree that the deadline to file dispositive and/or request a pre-trial hearing to be Friday, August 25, 2017.

6. The parties believe that referral of this matter for mediation would not be helpful.

7. The parties do not believe that a Pretrial Conference before the Court would serve any purpose at this time.

8. The parties shall entertain the possibility of an amicable resolution of this action.

WHEREFORE, the above parties through their respective undersigned attorneys of record, respectfully request that for the above stated reasons this Court take notice of the proposed scheduling conference / discovery Plan (ISC/DP) and grant such further equitable or legal relief the Court deems necessary.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico this 27th day of March, 2017.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT ON THIS SAME DATE, I ELECTRONICALLY FILED THE FOREGOING WITH THE CLERK OF THE COURT USING THE CM/ECF SYSTEM,

WHICH WILL SEND NOTIFICATION OF SUCH FILING TO ALL REGISTERED CM/ECF PARTICIPANTS.

/s/ Elbia Vázquez Dávila
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Secretary of Justice

WANDYMAR BURGOS VARGAS
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